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FILE -  
BASFWYANDOTTE  
WA/NE

Date: June 12, 1991

To: Anne Couture

From: Peter Masson

Subject: Review of ERM environmental assessment of BASF Wyandotte site

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JUN 12 1991

RESPONSE DIV  
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After reviewing the Environmental Resources Management (ERM) environmental assessment of the BASF Wyandotte site, I have several points which I feel merit further examination:

1) In Fig. 5-5 ERM assigns industrial/commercial/recreational use or industrial/commercial use to large areas of the site which exceed the  $1 \times 10^{-6}$  risk level for these uses. On pg. 5-1, 5-10, and 6-1 the report notes that to use the site in these ways there needs to be certain "design and construction factors" applied. On page 5-1 it is "assumed" that these factors would be applied and page 5-10 makes the "assumption" that they would be applied. However, nowhere in Fig. 5-5 are any of their recommendations qualified by noting these necessary assumptions.

2) According to the flow chart in Fig. 3-2 if an area did not meet the  $1 \times 10^{-6}$  risk level for a certain use, then design and construction factors were applied. For the areas noted above this was done. The flow chart goes on to indicate that if the subsurface conditions are a problem, then the next lowest land use group is assigned. On pg. 5-1 and 5-2 they say that they will do this for an "extra level of protection". However, areas 12 and 14 which did not meet the  $1 \times 10^{-6}$  risk level for industrial/commercial use and, as noted on page 5-11, had subsurface concerns were nonetheless assigned industrial/commercial use. According to the information in the report, they should have been assigned parking use only.

3) Page 5-11 says that areas 2 and 13 were assigned parking use "despite the conclusions reached from the risk calculation for these areas." These areas exceed the  $1 \times 10^{-6}$  risk level for all uses except parking. Page 5-11 also notes that these areas have subsurface concerns. According to the model presented in Fig. 3-2 and as noted above, it is doubtful that these areas could even be used for parking.

4) On page 5-4 the assumption is made that the risk level for recreational use will not exceed  $1 \times 10^{-6}$  providing that there is no contact with impacted soils or groundwater. This assumption is based on the fact that the time spent on the site would be less than that for commercial use. Although this is true, what time was spent would bring the user into much greater contact with the site than would spending the day inside a building, and it would be difficult to insure that there would be no contact with impacted soils.

The report is not very clear on that fact that before any of the recommended uses can be initiated, more work needs to be done to seal off the impacted soils at the site. Even if a cap is added, development in the future would be very limited so as not to disturb the cap and expose users or construction workers to the impacted soils. At this point it would first be necessary to seal off the contaminated soils at the site in some way and then conduct a risk assessment of the site under these new conditions. Until the site meets the  $1 \times 10^{-6}$  risk level for other uses it seems to qualify only for parking.

cc: Charles San Juan  
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